

In The United States District Court - Or The Eastern District Of Pennsylvania

Gartor Kiki Brown

V.

NO. 17-CV-1138

Chester County, et. al.,

Plaintiff's Motion To Consult

On July 14th, 2022, Plaintiff received a notice of Deposition from Assistant City Solicitor Katelyn Mays Pursuant to the City of Philadelphia defendants following the court order granting them to depose Brown. However, the notice did not present a notice that and other parties to depose Brown.

While at the deposition on 7/12/22, Brown notice also present via video were Mr. Gux Donatelli attorney for Chester County defendants & Mr. Matthew Fry from DiOrto & Sereni. Brown made his concerns apparent that he was never put on notice as to Chester County & Delaware County defendants; thus Brown presented that he would only be answering questions from Ms. Katelyn Mays as order (bxc 143).

The deposition was conducted by Ms. Mays, after complying with the Philadelphia defendants per ordered; the problem seemed to be raised by both Mr. Fry & Mr. Donatelli; both parties seemed to agree with Plaintiff that he was never put on notice & that another day would be more appropriate, & that a notice will be sent in the event simultaneously.

The reason for this motion is due to Brown's concerns the court granted Plaintiff's last motion to compel pursuant to Chester County defendants production of certain tabs (6); as of date, Brown had yet to receive anything to prepare for briefing at the summary judgment stage.

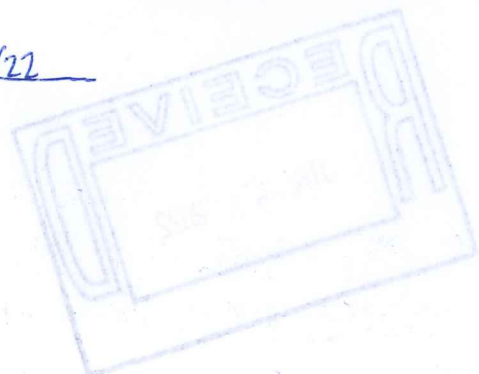
Brown also request that defendants must comply before any deposition as only to the Chester County defendants; as the motion to compel order was granted before any notice of deposition, & also, defendants had over two (2) years to depose Brown.



I hereby state that I am Garter Kiki Brown, Plaintiff in this case, that on July 16, 2022 Plaintiff motion to consult with the court was put into the jail mail box for first class postage to the address below

United States District Court
601 Market St. Philadelphia PA 19106

Dated 7/16/22



Garter Brown
Moshannon Valley P.C.
555 Beech Drive
Philipsburg PA 16866
(S) Garter Brown

Garter Brown
Mehanna Valley Process Center
555 9th Drive
Philadelpia, PA 19106
A6-33L
A0940075D

United States District Court
601 Market St.
Philadelphia, PA 19106

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